

**FIELD SAMPLING PLAN
FOR THE
SUGAR CREEK SCRAP
TERRE HAUTE, VIGO COUNTY, INDIANA**

Prepared for
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Prepared by
WESTON SOLUTIONS, INC.
Region V Superfund Technical Assessment and Response Team

February 22, 2013

Approved by: _____ Date: _____
EPA Region V
On-Scene Coordinator

Project Dates of Sampling:	February 25 – 26, 2013
CERCLA Site/Spill Identifier No.:	C5R4
Contractor Organization:	Weston Solutions, Inc.
Contract Name:	START III
Contract No.:	EP-S5-06-04
Technical Direction Document No.:	S05-0001-1302-008
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ACRONYM LIST

CA&C	Coal, ash and cinder
CFR	Code of Federal Regulations
COC	Chain-of-Custody
EPA	United States Environmental Protection Agency
FSP	Field Sampling Plan
IDEM	Indiana Department of Environmental Management
OSC	On-Scene Coordinator
PID	Photoionization Detector
PPE	Personal Protective Equipment
QAPP	Quality Assurance Project Plan
QA/QC	Quality Assurance/Quality Control
RCRA	Resource Conservation and Recovery Act
SOP	Standard Operating Procedure
START	Superfund Technical Assessment and Response Team
SVOC	Semi-Volatile Organic Compound
TCLP	Toxicity Characteristic Leaching Procedures
TDD	Technical Direction Document
VOC	Volatile Organic Compounds
WESTON	Weston Solutions, Inc.
XRF	X-ray Fluorescence

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1.0 Introduction

This Field Sampling Plan (FSP) identifies the data collection activities and associated quality assurance/quality control (QA/QC) measures specific to the Sugar Creek Scrap Site located at 1901 Prairieton Road, Terre Haute, Vigo County, Indiana (the Site; See Figure 1). All data will be generated in accordance with the quality requirements described in the *Superfund Technical Assessment and Response Team (START) III Generic Quality Assurance Project Plan (QAPP)*, dated June 2006. The purpose of this FSP is to describe site-specific tasks that will be performed in support of the stated objectives. The FSP will reference back to the QAPP for generic tasks common to all data collection activities including routine procedures for sampling and analysis, sample documentation, equipment decontamination, sample handling, data management, assessment and data review. Additional site-specific procedures and/or modifications to procedures described in the *START III Generic QAPP* are described in the following FSP elements.

This FSP is prepared, reviewed, and approved in accordance with the procedures detailed in the *START III Generic QAPP*. Any deviations or modifications to the approved FSP will be documented using **Table 1: FSP Revision Form**.

2.0 Project Team Member List

Management of the Site will be as documented in the *START III Generic QAPP*. Refer to the *START III Generic QAPP* for an organizational chart, communication pathways, personnel responsibilities and qualifications, and special personnel training requirements.

The following personnel will be involved in planning and/or technical activities performed for this data collection activity. Each will receive a copy of the approved FSP. A copy of the FSP will also be retained in the Site file.

Personnel	Title	Organization	Phone Number	Email
Jason Sewell	OSC	EPA	317-517-6987	sewell.jason@epa.gov
Shelly Lam	OSC	EPA	317-417-0980	Lam.shelly@epa.gov
Randy Kirkland	Project Manager	START	937-602-3089	Randy.kirkland@westonsolutions.com
Greg Roussos	Project Scientist	START	513-604-4797	Greg.Roussos@WestonSolutions.com
Dave Robinson	Health and Safety	START	937-572-3630	Dave.Robinson@westonsolutions.com
Lisa Graczyk	QA Reviewer	START	312-424-3339	lgraczyk@dynamac.com

Notes:

OSC – On-Scene Coordinator

QA – Quality Assurance

START – Superfund Technical Assessment and Response Team

EPA – United States Environmental Protection Agency

3.0 Planning and Problem Definition

3.1 Problem Definition

The U.S. Environmental Protection Agency received a request from the City of Terre Haute (the City) to mitigate imminent environmental threats at the Site. The Site is the Sugar Creek Scrap Site, located at 1901 Prairieon Road, Terre Haute, Vigo County, Indiana. In June 2012, the City hired Bruce Carter Associates to conduct a Phase I Environmental Site Assessment Update. The Phase I Update noted coal, ash and cinders (CA&C), slag, foundry sand and drums located onsite. In addition numerous tires and scrap/salvage vehicles and parts are located throughout the Site.

EPA will conduct a site assessment to investigate the CA&C, slag, foundry sand and contents of the drums and the conditions on site that could pose and imminent threat to human health, welfare, and the environment.

3.2 Site History and Background

The Sugar Creek Scrap Site is located adjacent to an automobile scrap / recycling company, Southwest Auto Wrecking, which has had several violations documented by the Indiana Department of Environmental Management (IDEM). IDEM issued a Notice of Violation Letter to Sugar Creek Scrap in 1998 and an Agreed Order in 2000 that documented Sugar Creek Scrap Inc. as a scrap metal recycling business and that the accepted scrap metal, foundry sands, and induction furnace baghouse dust from Gartland Foundry. An IDEM letter from 2009 reported several violations of unreported spills and releases, lack of storm water pollution prevention, potential refrigerant releases to the atmosphere, record keeping of mercury switches, and other housekeeping related practices.

An industrial solvent producer, Commercial Solvents Corp. is located southeast of the site and reported to have produced ethanol and possibly distilled other solvents. The property to the south used to be the location of the International Paper Mill, which was listed as a conditionally exempt small quantity generator of hazardous waste. To the northeast is the facility of Wabash Environmental Technology/Schering-Plough Animal Health which is listed as a Federal Comprehensive Environmental Response, Compensation, and Liability Information System site and had seven enforcement actions and eleven violations recorded from 1987 to 1997.

Scrap automobiles, tires, metal, etc are currently present on site. Tires are littered along the bank of the pond and several drums have been observed. It is suspected that dumping / landfill activities have taken place on site. Coal ash and cinders, slag, and foundry sand have also been observed on the property. Southwest Auto Wrecking's salvage operations are reported to be encroaching onto the Site. A large number of scrap automobiles are present at the Site from both encroachment and the former auto salvage activities.

3.3 Contaminants of Concern/Target Analytes

The contaminants of concern at the Site are heavy metals and VOCs. In order to characterize the contamination that exists at the Site, up to 10 surface soil, 5 surface water, and 5 waste samples will be collected and submitted for a combination of the following analyses.

- Toxicity Characteristic Leaching Procedure (TCLP) Resource Conservation and Recovery (RCRA) Metals
- Total RCRA Metals
- Total Cyanide
- Total PCBs
- Total Pesticides/Herbicides
- Total SVOCs
- Total VOCs
- Flashpoint
- pH

4.0 Project Description and Schedule

The site assessment will consist of tasks necessary to document and characterize threats posed to human health and the environment at the Site. Specifically the following tasks will be performed:

- Site reconnaissance, including documenting site conditions and potential hazardous waste, identifying sampling locations, and conducting continuous air monitoring;
- Surface soil and surface water sampling; and
- Waste sampling if open drums are encountered.

The sampling design is provided below in Section 6.0.

A commercial laboratory will be utilized for analytical services. Weston Solutions, Inc. (WESTON®) START will provide sample coordination including laboratory procurement and sample shipment. Sample labels and chain-of-custody (COC) paperwork will be generated by WESTON START. Samples will be packaged properly by WESTON START and shipped by courier, or transported directly to the laboratory. The turn-around time for the sample data will be 5 business days. The sample results will be reviewed and validated by a WESTON START chemist within 2 weeks of data receipt from the laboratory. A summary report of the sampling results will be submitted to EPA within 2 weeks of receipt of the validated data.

EPA and WESTON START will begin the site assessment on Monday, February 25, 2013. The site assessment is expected to take one to two days.

5.0 Project Quality Objectives

5.1 Project Objectives

The objective of sampling activities is to determine if the materials present on the Site pose a threat to human health and the environment.

The objectives for this investigation include:

- Identify the constituents and characteristic properties of material present in surface soil, surface water, and drums on the Site;
- Determine if a removal action is warranted based on National Contingency Plan criteria and, if so, whether the response should be classified as emergency, time-critical, or non-time critical;
- Rapidly assess and evaluate the urgency, magnitude, extent, and effects of a release, or threatened release, of hazardous substances, pollutants or contaminants identified and their affects on human health and/or the environment;
- Supply the Agency for Toxic Substances and Disease Registry or others with information about the nature and magnitude of any health threats associated with the identified threats;
- Support subsequent public health advisories; and
- Determine a remedy to eliminate, reduce, or control risks to human health and the environment and to support an Action Memorandum documenting the identified removal approach.

5.2 Measurement and Performance Criteria

Generic measurement and performance criteria described in the *START III Generic QAPP* will be used to ensure that data are sufficiently sensitive, precise, accurate, and representative to support site decisions.

5.3 Data Quality Objectives

Data quality objectives address requirements that include when, where, and how to collect samples, the number of samples, and the limits on tolerable error rates. These steps should periodically be revisited as new information about a problem is learned.

The waste sampling results for TCLP metals, TCLP VOC's, ignitibility and corrosivity will be compared to the hazardous waste criteria outlined in 40 Code of Federal Regulations (CFR), Part 261 Subpart C and 40 CFR Part 761 to determine whether an emergency response is needed pursuant to 40 CFR Part 300.

Surface soil sampling results for total and TCLP RCRA metals, total cyanide, total PCBs, total Pesticides/Herbicides, total SVOCs and total VOCs will be compared to criteria published in the EPA Removal Management Levels.

Surface water sampling results for total RCRA metals, total cyanide, total PCBs, total Pesticides/Herbicides, total SVOCs and total VOCs will be compared to criteria published in the Indiana Water Quality Standards.

6.0 Sampling Design

WESTON START will perform the Site activities detailed in the following subsections.

6.1 Surface Soil Sampling

The surface soil sample will consist of a grab or 5-point composite, collected from 0 to 6 inches below ground surface. Each surface soil sample location will be recorded with the use of a Trimble GPS instrument. Each surface soil grab sample will be collected using dedicated disposable plastic trowels. Each surface soil 5-point composite sample will be homogenized using dedicated disposable plastic trowels and aluminum pans. A portion of each sample will be placed into a plastic bag and screened using an X-ray fluorescence (XRF) analyzer and a microR radiation meter. The XRF readings will be recorded onto a XRF screening log (Attachment A). The microR readings will be recorded in the logbook.

In addition, the soil will be screened with a calibrated Photoionization Detector (PID). A small sample (about the volume of a tablespoon) from the sample area will be placed into a ziploc bag, allowed to equilibrate for at least 5 minutes, then the headspace in the bag will be screened for VOCs using the PID. If a VOC concentration greater than 5 parts per million (ppm) is measured in the headspace, a sample will be collected for laboratory analysis of VOCs.

The surface soil samples will be transferred directly into laboratory-provided sample containers. Sample containers will be labeled using nomenclature as outlined in Section 6.7. All samples will be placed into a cooler on ice for delivery to the laboratory under chain of custody.

The sample container, volume, and preservation requirements are presented in **Table 2: Sampling and Analysis Summary**.

The surface soil sampled may be analyzed for Total RCRA Metals, TCLP RCRA Metals, Total Cyanide, Total PCB, Total Pesticides/Herbicides, Total SVOCs, and/or Total VOCs. A 10 day turnaround time will be required from the laboratory.

6.2 Surface Water Sampling

Surface water samples will be collected from either the Wabash River or the shallow pond created by the low level area. All surface water sample locations will be recorded with the use of a Trimble GPS instrument.

Surface water may be collected directly into sample containers if the depth or flow rate of the liquid is sufficient. Polyvinyl chloride piping will be used to extend sample containers into the surface water where necessary. Sample containers will be labeled using the nomenclature outlined in Section 6.7, and placed in a cooler on ice for delivery to the designated laboratory under chain of custody. The sample container, volume, and preservation requirements are presented in **Table 2: Sampling and Analysis Summary**.

The surface water samples may be analyzed for total RCRA metals, total cyanide, total PCBs, total Pesticides/Herbicides, total SVOCs and total VOC. A 10 day turnaround time will be required from the laboratory

6.3 Drum Sampling

Waste samples will be collected from drums, small containers or other miscellaneous containers at the Site. The sample locations will be marked clearly with the sample name using a grease pen, spray paint, or a pin-flag. Containers will be opened with non-sparking tools for this task. Solid waste sample collection will be accomplished using a disposable poly scoop. If the solid waste is easily accessible, it will be scraped into a pile and spooned directly into sampling containers. Liquid waste sample collection will be accomplished using a dedicated coliwasa.

The waste samples may be analyzed for total VOCs, flashpoint and pH.

The sample container, volume, and preservation requirements are presented in **Table 2: Sampling and Analysis Summary**.

6.4 Sample Numbering System

All samples for analysis, including QC samples, will be given a unique sample number. The sample numbers will be recorded in the field logbook, the COC paperwork, and the shipment documents.

WESTON START will assign each sample a project sample number. The project sample number highlights the suspected contaminated area and location, and will be used for documentation purposes in field logbooks, as well as for presentation of the analytical data in memoranda and reports. The project sample numbering system will be composed of the components below.

Project Identifier

The first part of the project sample numbering system will be the three-character designation CSS to identify the sampling site, Sugar Creek Scrap.

Matrix

This shall consist of two letters identifying the matrix. These matrix identifiers are as follows:

SS – Surface Soil
SW – Surface Water
WS – Waste Solid
WL – Waste Liquid

Sequence Identifier

This shall consist of a two-digit sequence number that tracks the number of samples collected from the Site for a particular matrix. Sequence 01 refers to the first sample, and sequence 02 refers to the second sample.

Sample Date

This shall consist of a six digit date (*e.g.*, 022513) for February 25, 2013.

Examples of the sample identifications for the Site are as follows:

- CSS-SS01-022513: first surface soil sample collected from the CSS Site on February 25, 2013.
- CSS-SW03-022513: third surface water sample collected from the CSS Site on February 25, 2013.

6.5 Management of Investigation-Derived Wastes

For purposes of this FSP, investigation-derived wastes are defined as any byproduct of the field activities that is suspected or known to be contaminated with hazardous substances. The performance of field activities will produce waste products, such as spent sampling supplies (*e.g.*, bailers, drum thieves, scoops), and expendable Personal Protective Equipment (PPE). All waste generated during the site assessment will be placed in trash bags and disposed of as general refuse. If non-dedicated sampling equipment (*e.g.*, bucket auger) is used for sample collection, decontamination water will be generated. All decontamination water generated during the site assessment will be stored in drums or five-gallon buckets and left on-site in a staging area with EPA approval. If required, disposal arrangements will be executed in accordance with appropriate local, state, or federal regulations. WESTON START will refer to the EPA's *Management of Investigation-Derived Wastes During Site Inspections* (EPA, 1991) guidance on off-site disposal policies, if this action is deemed necessary.

7.0 Sampling Procedures

7.1 Sampling Standard Operating Procedures

The following WESTON Standard Operating Procedures (SOP) will be used during the site evaluation:

- SOP003 – Removal Assessment
- SOP101 – Logbook Documentation
- SOP102 – Field Notes
- SOP103 – Chain-of-Custody Documentation
- SOP104 – Photographic and Video Documentation
- SOP203 – Surface Water Sampling
- SOP205 – Field pH Measurement
- SOP301 – Decontamination Procedures
- SOP302 – Surface Soil Sampling
- SOP401 – Drum Sampling
- SOP402 – Tank Sampling

7.2 Decontamination Procedures

General decontamination procedures are described in Section B.2 of the *START III Generic*

QAPP.

The following standard decontamination protocols will be used:

- All disposable sampling supplies and PPE will be bagged and sealed. If left on site, the trash bag will be labeled identifying the contents.
- If necessary (but not anticipated), decontamination water will be stored in drums or five-gallon buckets, labeled, and staged in a designated storage area at the Site.

8.0 Sample Handling, Tracking, and Custody Procedures

All samples will be identified, handled, shipped, tracked, and maintained under COC, in accordance with *START III Generic QAPP* Section B.3.

9.0 Field Analytical Methods and Procedures

9.1 Field Analytical Methods and SOP

Field analytical methods will not be employed during the site assessment. All analytical methods will be performed by a commercial laboratory and are presented in Tables 2-4 of this report.

9.2 Field Testing Laboratory

A field testing laboratory will not be used during the site assessment.

9.3 Screening/Confirmatory Analyses

A HAZCAT kit will be on site and used to screen potentially hazardous materials. An XRF will be used to screen for heavy metals contamination. A PID will be used to screen soil samples for VOCs.

10.0 Fixed Laboratory Analytical Methods and Procedures

An EPA-certified commercial laboratory will be used. The laboratory name, address, contact person, telephone number, and fax number are as follows:

ALS Environmental
4388 Glendale Milford Road
Cincinnati, Ohio
(513) 733-5336
Contact: Ben Dressman

The analytical methods are detailed in Table 2 of this FSP.

11.0 Quality Control Activities

11.1 Field Quality Control

Field QC samples will be collected and analyzed for this project at the frequency described in *START III Generic QAPP*, Table 4. The number of QC samples collected for each analytical parameter and concentration level are listed in **Tables 2-4: Sampling and Analysis Summary**.

11.2 Analytical Quality Control

QC for analytical procedures will be performed at the frequency described in *START III Generic QAPP*, Tables 5 and 6. In addition, method-specific QC requirements will be used to ensure data quality.

11.3 Performance Evaluation Samples

Performance evaluation samples will not be collected during this sampling event.

12.0 Documentation, Records, and Data Management

Documentation, record keeping, and data management activities will be conducted in accordance with the *START III Generic QAPP*, Section B.10.

13.0 Quality Assurance Assessment and Corrective Actions

No field audits will be conducted due to the short-term (one or two day) sampling activity.

14.0 Reports to Management

Reports to management will be written and distributed in accordance with the *START III Generic QAPP*, Section C.

15.0 Steps 1, 2 and 3: Data Review Requirements and Procedures

Step 1: Data collection activities, including sample collection and data generation, will be verified in accordance with the *START III Generic QAPP*, Section D.

Step 2: Data will be validated in accordance with the *START III Generic QAPP*, Section D. A WESTON START chemist will validate the data.

Step 3: Data will be reviewed for usability in accordance with the *START III Generic QAPP*, Section D.

TABLES

Table 1
FSP Revision Form

Site: Sugar Creek Scrap Site Assessment, Terre Haute, Vigo County, Indiana

OSC: Jason Sewell

TDD: S05-0001-1302-008

Date	Rev. No.	Proposed Change to FSP/QAPP	Reason for Change of Scope/Procedures	SAP Section Superseded	Requested By	Approved By

Table 2
Sampling and Analysis Summary

Site: Opossum Creek Drum Site Assessment, Dayton, Montgomery County, Ohio

OSC: Steve Renninger

TDD: S05-0001-1211-013

Matrix	Analytical Parameter	Analytical Method (SW-846)	Containers (Numbers, Size, and Type)	Preservation Requirements	No. of Sampling Locations (up to)	No. of Field Duplicates	No. of MS/MSD Pair or Spike / Duplicates	No. of VOA Trip Blanks	No. of Equip./ Rinsate Blanks	Total No. of Samples to Lab (up to)
Solid – Soil	Total RCRA Metals	(6010/6020/7471)	1 8–oz. glass wide-mouth jar	Ice, Cool to 4°C	10	1	0	0	0	11
Solid – Soil	TCLP RCRA Metals	(1311/6010/6020/7470)	1 8–oz. glass wide-mouth jar	Ice, Cool to 4°C	10	1	0	0	0	11
Solid – Soil	Total Cyanide	(9010/9012)	1 8–oz. glass wide-mouth jar	Ice, Cool to 4°C	10	1	0	0	0	11
Solid – Soil	Total PCBs	(8082)	1 8–oz. glass wide-mouth jar	Ice, Cool to 4°C	10	1	0	0	0	11
Solid - Soil	Total Pesticides / Herbicides	(8081) / (8151)	1 8–oz. glass wide-mouth jar	Ice, Cool to 4°C	10	1	0	0	0	11
Solid - Soil	Total SVOCs	(8270C)	1 8–oz. glass wide-mouth jar	Ice, Cool to 4°C	10	1	0	0	0	11
Solid - Soil	Total VOCs	(5035/8260B)	2-3 40-ml VOC Vials	Sodium bisulfite and methanol;	10	1	0	0	0	11
Bulk – Waste	Total VOCs	(8260B)	1 8–oz. glass wide-mouth jar	Ice, Cool to 4°C	5	0	0	0	0	5
Bulk - Waste	Flashpoint	(1010/1020)	1 8–oz. glass wide-mouth jar	Ice, Cool to 4°C	2	0	0	0	0	2

Matrix	Analytical Parameter	Analytical Method (SW-846)	Containers (Numbers, Size, and Type)	Preservation Requirements	No. of Sampling Locations (up to)	No. of Field Duplicates	No. of MS/MSD Pair or Spike / Duplicates	No. of VOA Trip Blanks	No. of Equip./ Rinsate Blanks	Total No. of Samples to Lab (up to)
Bulk - Waste	Corrosivity	9040C/9045D	1 8-oz. glass wide-mouth jar	Ice, Cool to 4°C	2	0	0	0	0	2
Liquid - Water	Total RCRA Metals	(6010/6020/7471)	1 500 ml. plastic bottle	Ice, Cool to 4°C	5	1	0	0	0	6
Liquid - Water	TCLP RCRA Metals	(1311/6010/6020/7470)	1 500 ml. plastic bottle	Ice, Cool to 4°C	5	1	0	0	0	6
Liquid - Water	Total Cyanide	(9010/9012)	1 500 ml. plastic bottle	Ice, Cool to 4°C	5	1	0	0	0	6
Liquid - Water	Total PCB	(8082)	1 500 ml. plastic bottle	Ice, Cool to 4°C	5	1	0	0	0	6
Liquid - Water	Total Pesticides / Herbicides	(8081) / (8151)	1 500 ml. plastic bottle	Ice, Cool to 4°C	5	1	0	0	0	6
Liquid - Water	Total SVOCs	(8270C)	1 500 ml. plastic bottle	Ice, Cool to 4°C	5	1	0	0	0	6
Liquid - Water	Total VOCs	(8260B)	1 500 ml. plastic bottle	Ice, Cool to 4°C	5	1	0	0	0	6

Notes:

°C – Degrees Celsius

Equip. – Equipment

L – Liter

ml – milliliter

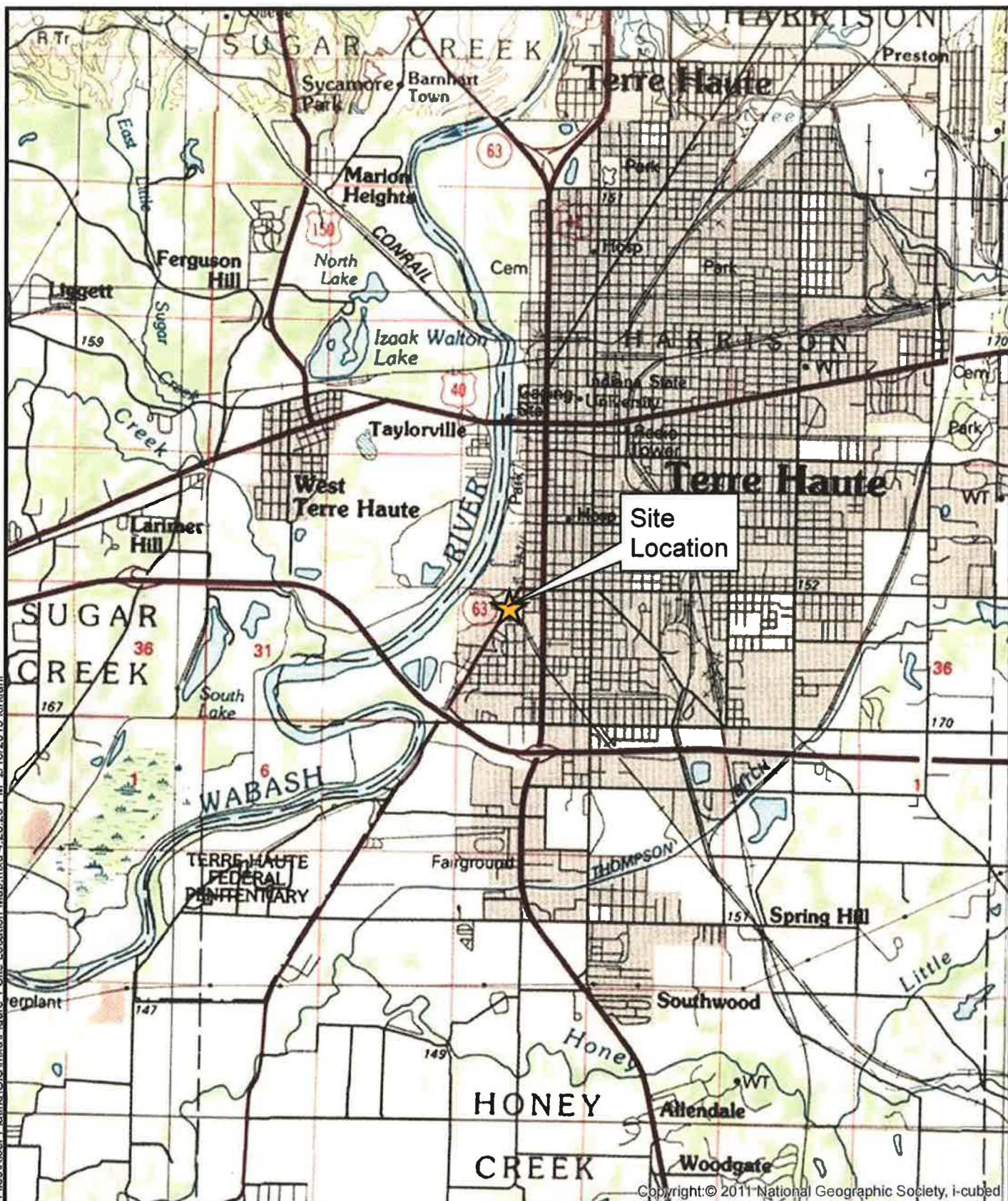
No. – Number

Oz. – Ounce

TCLP – Toxicity Characteristic Leaching Procedure

FIGURES

FILE: C:\START Project Files\Kiser Plating\GIS\mxd\Figure 1 Site Location Map.mxd 4:28:25 PM 2/18/2013 kirkland



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0 1 Miles



Prepared for:
U.S. EPA REGION V

Contract No.: EP-S5-06-04
TDD: S05-0001-1302-008
DCN: 2096-4H-BGXL



Prepared By:
WESTON
SOLUTIONS, INC

4710-A Interstate Drive
Cincinnati, Ohio 45246

Figure 1
Site Location Map
Sugar Creek Scrap Site
Terre Haute, Vigo County, Indiana

Legend



0 450 Feet



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U.S. EPA REGION V

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Prepared By:
WESTON
SOLUTIONS, INC

4710-A Interstate Drive
Cincinnati, Ohio 45246

Figure 2
Site Layout Map
Sugar Creek Scrap Site
Terre Haute, Vigo County, Indiana

ATTACHMENTS

XRF Screening Log

Site: Sugar Creek Scrap SA

Dump Site: _____

Logged By: _____ **Instrument Type/ID:** _____

[illegible]

XRF Screening Log

Site: Sugar Creek Scrap SA

Dump Site: _____

Logged By: _____ **Instrument Type/ID:** _____

[illegible]

XRF Screening Log

Site: Sugar Creek Scrap SA

Dump Site: _____

Logged By: _____ **Instrument Type/ID:** _____

[illegible]

XRF Screening Log

Site: Sugar Creek Scrap SA

Dump Site: _____

Logged By: _____ **Instrument Type/ID:** _____

[illegible]